



May 12, 2022

VIA ECF

Magistrate Sarah L. Cave
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

The Parties' letter-motion seeking an extension of time to file a proposed ESI Order (ECF No. 345) is GRANTED.

The Clerk of Court is respectfully directed to close ECF No. 345.

05/13/2022 SO ORDERED


SARAH L. CAVE
United States Magistrate Judge

Re: *JLM Couture, Inc. v. Hayley Paige Gutman, et al*; 20-cv-10575-LTS-SLC

Dear Judge Cave:

We represent Plaintiff JLM Couture, Inc. ("JLM") and Third-Party Defendant Joseph Murphy ("Murphy") (collectively, the "JLM Parties") in the above-referenced action. We write jointly with counsel for Defendants pursuant to Rule I(E) of Your Honor's Individual Rules of Practice to respectfully request an extension of the time to file a proposed ESI Order as required by Paragraph 10(b) of the April 19, 2022, Case Management Plan and Order [Dkt. No. 342] (the "CMC"), from May 13, 2022, to June 21, 2022.

Pursuant to the CMC, the parties are expected to have an ESI discovery protocol in place by May 13, 2022. As the Court may recall the parties previously met and conferred and agreed to mutual preservation protocols for certain social media accounts that were of concern. [Dkt. No. 238].

As to the issues that remain, the parties have met and conferred, and discussed the various provisions of the proposed ESI Order and have mutually agreed that it would be more efficient to agree upon many of the subjects after both parties have served their comprehensive first set of demands, as those demands may dictate some of what the parties agree to. For example, reaching meaningful agreements as to searching methods and costs is difficult now as the parties have not discussed the full scope of one another's demands. The parties have until May 31, 2022, to serve their first set of demands, and believe consideration of the ESI Order after that time will be more efficient.

As such, the parties are respectfully requesting that the deadline to submit an ESI Order be extended to June 21, 2022.

ADELMAN MATZ P.C.

PHONE: (646) 650-2207 • FAX: (646) 650-2108

MAILING:
1173A SECOND AVENUE, SUITE 153
NEW YORK, NEW YORK 10065

OFFICE:
780 THIRD AVENUE, 14TH FLOOR
NEW YORK, NEW YORK 10017

This is the first such request for the relief sought and it does not affect any other dates in this action. All parties consent to the extension request.

We appreciate the Court's time, and should Your Honor need any further information, we are available at the Court's convenience.

Respectfully submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM:' or similar initials.

Sarah M. Matz, Esq.

Cc: Counsel of Record via ECF

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